

improve its corporate governance and internal procedures to comply with applicable laws and to protect Kandi and its shareholders from a repeat of the damaging events described herein, including, but not limited to, putting forward for shareholder vote the following resolutions for amendments to the Company's By-Laws or Articles of Incorporation; and the following actions as may be necessary to ensure proper Corporate Governance Policies:

- (1) a proposal to strengthen the Board's supervision of operations and develop and implement procedures for greater shareholder input into the policies and guidelines of the Board;
- (2) a provision to permit the shareholders of Kandi to nominate at least three independent candidates for election to the Board; and
- (3) a proposal to ensure the establishment of effective oversight of compliance with applicable laws, rules, and regulations;

D. Determining and awarding to Kandi exemplary damages in an amount necessary to punish Defendants and to make an example of defendants to the community according to proof at trial;

E. Awarding Kandi restitution from Defendants, and each of them;

F. Awarding Plaintiffs the costs and disbursements of this action, including reasonable attorneys' and experts' fees, costs, and expenses; and

G. Granting such other and further equitable relief as this Court may deem just and proper.

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury on all issues so triable.

Dated: May 23, 2017

**LIFSHITZ & MILLER LLP**

*/s/ Joshua M. Lifshitz*

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Joshua M. Lifshitz  
Email: [jml@jlclasslaw.com](mailto:jml@jlclasslaw.com)  
821 Franklin Avenue, Suite 209  
Garden City, NY 11530  
Telephone: (516) 493-9780  
Facsimile: (516) 280-7376